

# **EXHIBIT D**

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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH - CENTRAL DIVISION

Bill.com, LLC,  Plaintiff,  v.  Danielle Cox,  Defendant.	<b>[PROPOSED] TEMPORARY RESTRAINING ORDER</b>  Case No. 2:23-cv-00026-JNP  Hon. Jill N. Parrish
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**[PROPOSED] TEMPORARY RESTRAINING ORDER**

This matter coming before this Court upon Plaintiff Bill.com, LLC's ("BILL") Emergency Motion for Temporary Restraining Order and Preliminary Injunction and Supporting Memorandum, notice having been given to Defendant Danielle Cox ("Cox") and the Court being advised in the premises, the Court finds as follows:

1. BILL has a significant likelihood of success on the merits of its claims pled in its Complaint;
2. BILL is likely to face irreparable harm in the absence of injunctive relief;
3. The balancing of harms weighs in favor of BILL; and
4. The public interest would be served by granting BILL's Motion and entering the requested relief.

Accordingly, the Court orders as follows:

- A. Defendant Danielle Cox and all parties in active concert or participation with her are temporarily enjoined from using or disclosing any of BILL's confidential, proprietary, and/or trade secret information;

- B. Defendant Danielle Cox and all parties in active concert or participation with her are ordered to return to BILL all originals and copies of all files, data, information, and/or documents that contain or relate to BILL's confidential, proprietary, and trade secret information, including without limitation all electronic media. The return of that electronic information shall be done through a third-party forensic computer expert in order to preserve relevant metadata;
- C. Defendant Danielle Cox shall immediately return to BILL the laptop computer that BILL issued to her, without altering or deleting any of the data on that device; and
- D. Defendant Danielle Cox and all parties in active concert or participation with her, are ordered to preserve all documents, data, and electronic information, and to produce for inspection and imaging by a third-party forensic computer expert all computers and other electronic storage devices and email accounts belonging to, under the control of, accessible to, or operated by Defendant Cox.

Plaintiff shall serve this Order upon Defendant Cox. The terms of this Order shall remain in effect for fourteen (14) days after the date of its entry, or until further Order of this Court.

Dated: \_\_\_\_\_

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United States District Court Judge